

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: John Edward Sabol

Debtor(s)

LAKEVIEW LOAN SERVICING, LLC

Movant

vs.

John Edward Sabol

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 23-02015 MJC

Chapter 13

Related to Document 24

RESPONSE TO MOTION FOR SALE OF PROPERTY FREE AND CLEAR OF LIENS

LAKEVIEW LOAN SERVICING, LLC enters its response to the Debtor's Motion to For Sale of Property Free and Clear of Liens.

1. Creditor's loan is secured by a mortgage on Debtor's property at 752 Forest Ln, Pottsville, PA 17901.

2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full.

WHEREFORE, the Movant, LAKEVIEW LOAN SERVICING, LLC, prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Respectfully submitted,

Date: December 14, 2023

/s/ Michael P. Farrington
Michael P. Farrington, Esquire
Attorney I.D. 329636
KML Law Group, P.C.
BNY Mellon Independence Center
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Philadelphia, PA 19106
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CERTIFICATE OF SERVICE

RESPONSE TO MOTION FOR SALE OF PROPERTY FREE AND CLEAR OF LIENS

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on December 14, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

John Edward Sabol
752 Forest Lane
Pottsville, PA 17901

Attorney for Debtor(s)

Paul Donald Murphy-Ahles, Esq.
Dethlefs Pykosh & Murphy
2132 Market Street
Camp Hill, PA 17011

Trustee

Jack N. Zaharopoulos
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail.

Dated: December 14, 2023

/s/ Michael P. Farrington

Michael P. Farrington Esq.
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